



ecology and environment, inc.

4319 COVINGTON HIGHWAY, DECATUR, GEORGIA 30035, TEL. 404-288-7711

International Specialists in the Environmental Sciences

2 8 0012

36610

April 12, 1982

Mr. R. D. Stonebraker, Deputy Chief
Hazardous Emergency Response Branch
Air and Hazardous Materials Division
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30365

Dear Mr. Stonebraker:

This letter and the enclosed site inspection reports will serve to complete the requirements of TDD F4-8203-16 and document FIT's recommendations regarding three disposal locations used by John P. Saad and Sons Oil Reclaimers. These locations are the sinkhole on and adjacent to the Saad facility on Trousdale Drive in Nashville, the Smyrna Air Port Storage Tank, and the wooded dump location off Silver Spring Road in Smyrna.

Recommendations

- A. Saad Facility, Trousdale Drive, Nashville We recommend a resistivity survey to attempt to track the upgradient underground pathway of the Croft spring to suspected sources of contamination (e.g., the sinkhole areas on the Saad and L&N Railroad properties). Such a study will aid in identifying the sources of pollution requiring remediation to clean-up the Croft spring.

Secondly, we suggest a drilling attempt in the sinkhole location to characterize the quantity of contamination and determine the feasibility of removal. This would include drilling on both the Saad and L&N sides of the railroad track that crosses the sink area. Samples from both areas should be collected for chemical analyses (organics and metals) to try to characterize the chemical pollutants associated with Saad and L&N.

Thirdly, we suggest that EPA consider regulatory actions against Saad and National Paint and any other local chemical-use facilities to assure these firms are not presently mismanaging disposal of oil or hazardous chemicals.

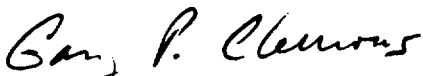
Finally, we recommend a thorough sampling study to characterize soil and ground water pollution on the L&N yard, the Saad property, the National Paint property, the Croft farm springs, and surface drainage areas recharging the sinkhole.

- B. Smyrna Airport Storage Tank - We suggest a RCRA compliance inspection to determine if this facility is in violation of hazardous waste storage requirements. The tank has leaked a large quantity of wastes containing hazardous substances on the ground and likely has caused ground water pollution. The local geology is conducive to rapid and long-distant movement of chemical contaminants in ground water as evidenced by the Silver Spring situation. We suggest a thorough appraisal of ground water uses in a two mile radius around the tank location. This effort should identify any ground water wells which should be sampled for chemical analyses. A resistivity survey is recommended to locate zones of potential ground water contamination and directions of movement.
- C. Silver Spring Road Dump Area - Our inspection revealed the presence of a tanker truck trailer and a smaller tank (ca 400 gallon capacity) in the wooded area used by Saad. These two containers apparently still contain liquid wastes. Since the area is accessible to the public, site security is lacking. Unless sampling shows these tanks contain non-hazardous liquids, we recommend that they be emptied or removed to prevent the release of their contents by vandalism or leakage.

Secondly we recommend an appraisal of the health effects associated with drinking contaminated water from the local wells known to be polluted. Even though a clean public water supply is available some residents are continuing to use contaminated private wells. The health risks associated with this exposure should be evaluated and appropriate action taken.

The FIT team is capable of assisting you in following through with any of these recommended actions. Please advise us as necessary.

Sincerely,



Gary P. Clemons, Ph.D.
Project Officer

GPC/lsr